

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT DIVISION

ERICA LAYTON, SAMUEL LAYTON : CIVIL ACTION NO. 13-CV-1634
AND GERALD BUNTYN, JR.

VERSUS : JUDGE HICKS

CHEVRON ENVIRONMENTAL : MAGISTRATE JUDGE HORNSBY
MANAGEMENT COMPANY and
CONESTOGA-ROVERS & ASSOCIATES,
INC.

MEMORANDUM IN SUPPORT OF
PLAINTIFFS' MOTION FOR EXTENSION OF TIME

MAY IT PLEASE THE COURT:

1.

On or about October 24, 2013, the defendants, CHEVRON ENVIRONMENTAL MANAGEMENT COMPANY and CONESTOGA-ROVERS & ASSOCIATES, INC., filed their Motion for Summary Judgment Regarding Prescription.

2.

Counsel for plaintiffs are currently in a two-week trial before Honorable Penelope Richard in the matter entitled *Mark Clark, et al v. BP America, Inc., et al*, Docket No. 18,866, 38th Judicial District Court, Cameron Parish, Louisiana.

3.

For this reason, plaintiffs respectfully requests that the Court grant a five (5) day extension within which to file their memorandum in opposition to the defendants' Motion for Summary Judgment.

WHEREFORE, the plaintiffs pray that the Court grant the requested five (5) day extension within which to file the plaintiffs' memorandum in opposition to the defendants Motion for Summary Judgment, together with the necessary evidence in support of that opposition.

Respectfully submitted, this 8th day of November, 2013.

/s/ J. Rock Palermo III

J. Rock Palermo III (#21793)

Turner D. Brumby (#33519) (trial attorney)

VERON, BICE, PALERMO & WILSON, L.L.C.

721 Kirby Street, 70601

P.O. Box 2125

Lake Charles, LA 70602-2125

Telephone: (337) 310-1600

Facsimile: (337) 310-1601

rock@veronbice.com

turner@veronbice.com

Counsel for Plaintiffs Erica Layton, Samuel Layton and Gerald Buntyn, Jr.

CERTIFICATE OF SERVICE

I hereby certify that, on this 8th day of November, 2013, I caused the foregoing pleading to be served by electronic mail on all counsel of record.

/s/ J. Rock Palermo III
J. ROCK PALERMO III